



Ohio Rubber

September 24, 1984

Mr. Rodney Beals
OhioEpa
2110 E. Aurora Rd.
Twinsburg, OH 44087-1969



Dear Mr. Beals:

RE: Your Letter of May 24, 1984

My apologies for the delay in responding to you. We have had a number of problems not the least of which is that Jack McLellan left our employ two weeks ago, and I still have not found a person to fill the job which I mentioned to you on the phone, that of Government Regulations Compliance Coordinator. All of this, obviously, has complicated things for us, but we hope to work out of it fairly soon.

The following has been done:

1. As I told you on the telephone, we have decided not to transport any hazardous waste ourselves so we will not need to register with PUCO.
2. I have had the underground tank tested for leakage by an independent firm and found that it does not leak. While doing this we used temporary above ground tanks so we could watch them for leakage on a daily visual check. I would like to continue using them on the same basis until we can get a proper above ground tank on a cement pad with adequate diking. This way we can be absolutely sure of no leakage. Of course, when we put in the new tank we will have that leak tested before using.

It would seem to me that, if we can do this, we would not need to maintain sticking logs on the underground tank.

We would pump out the underground tank and fill it with sand to prevent any further use.

I assume no permit is needed for the new tank as it is above ground, will not be holding hazardous waste, and will be emptied regularly in less than 90 days.

3. New tank would be checked at least weekly for leaks.
4. We have made arrangements with Chemical Associates to pick up recovered solvent as mentioned in your report (which is about 90% solvent with 10% rubber and clay fines,) separate the solvent from clay and rubber fines, drum off the fines and return them to us in the drums. Solvent will be reintroduced into oil and all of this will be traceable.

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Also, after discussion with personnel at our parent company, Eagle-Picher Industries, we have decided that we would like to get away from any use of land fills for ignitable hazardous waste and start having it incinerated. Would it be possible for you to advise me of what properly permitted incinerators are located in Ohio, particularly Northeast Ohio.

I appreciate your forbearance on our delays. Hopefully, before too long, we will have our new person on board and will get everything on stream.

Sincerely yours,

E. Paul Robbins

E. Paul Robbins
Employee Relations Manager

EPR:jlr

cc: D. Cameron
C. Jones